

# AIELLO CANNICK

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Robert J. Aiello  
Deveraux L. Cannick

Jennifer Arditi

Of Counsel

John S. Esposito  
Anthony J. Rattoballi

APPLICATION GRANTED  
SO ORDERED:

*Wsn*  
Vincent L. Briccetti, U.S.D.J.

Dated: *1/15/21*

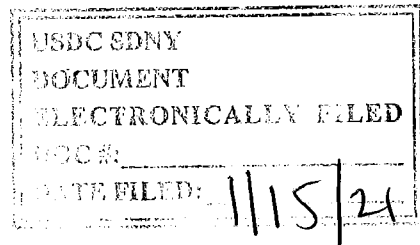
White Plains, NY

*The Court finds the proposed  
CAVES Act findings sufficient. The guilty  
plea is scheduled for 1/27/2021 at 9:00 a.m., to  
be conducted by video conference.*  
January 14, 2021

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VIA ECF

Honorable Vincent L. Briccetti  
The Hon. Charles L. Bricant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150



Re: United States v. Lonnie Avant  
20-cr-00414 (VB)

Dear Honorable Judge Briccetti:

As indicated at the January 13<sup>th</sup>, 2021 conference, Mr. Avant and the Government have reached a resolution of the matter.

Mr. Avant is anxious to enter a change of plea and move on with his life. He looks forward to being designated to a facility that would afford him the opportunity to learn salable skills. Unfortunately, Westchester Correctional Facility does not afford him that opportunity. Specifically, Mr. Avant is seeking to obtain his CDL. He needs a certain amount of time to complete the training. Delaying his change of plea hearing significantly impacts the time he is ultimately designated and as a result, impacts the amount of time in which he can receive training by BOP. Thus, he waives his right to be physically present before Your Honor for a change of plea hearing and respectfully asks to be allowed to enter a change of plea remotely (via telephone, video or both). Given Mr. Avant's goals, further delay would result in an injustice.

Therefore, we respectfully request that the matter be scheduled (for a date and time convenient for the Court) for a remote plea hearing.

Thank you in advance for your consideration.

Very truly yours,

/s/ Deveraux L Cannick

Deveraux L. Cannick

DLC/ad

Cc: AUSA Nicholas Bradley via email